

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Reexamination of Roaming Obligations of	)	WT Docket No. 05-265
Commercial Mobile Radio Service Providers	)	
	)	
Automatic and Manual Roaming Obligations	)	WT Docket No. 00-193
Pertaining to Commercial Mobile Radio Services	)	

**Comments of VeriSign, Inc.**

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1. VeriSign as the largest global provider of service bureau roaming solutions is an interested party in the Commission's Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers. VeriSign provides these solutions pursuant to both automatic and manual agreements among its carrier customers both in the United States and worldwide, incorporating an array of different systems, technologies, authentication and fraud detection mechanisms, and payment methods. In addition, VeriSign through its American Roaming Network provides CMRS ad hoc manual roaming based capabilities directly to end user customers, operating as a reseller under current Commission rules.

2. Insofar as the Commission in this NPRM treats roaming policies affecting its carrier customers, VeriSign provides no comment on the preponderance of questions and alternatives posed. However, to the extent that the contemplated courses of action are based on roaming support alternatives in the CMRS marketplace, the Commission should be cognizant of the capabilities provided by roaming service bureaus such as those of VeriSign, and applicable especially for new services.<sup>1</sup>

## **Manual Roaming**

3. The Commission seeks "...comment on how often subscribers avail themselves of manual roaming...[and] to what extent has manual roaming fallen into disuse or been replaced by automatic roaming."<sup>2</sup> The facts clearly indicate a continuing need for manual roaming today. VeriSign is the largest provider of manual roaming service in the U.S. More than 13 million calls per month are serviced by American Roaming Network. Of those calls, more than 12 million usually do nothing when offered a manual roaming option. More than 800,000 users dial a digit, but do not complete a call. Only 18,000 calls are ultimately completed – 0.14 % of the subscriber "demand" for connectivity.

4. In light of this continuing need for manual roaming, the Commission should consider potential clarifications to the requirements. This would include the ubiquitous

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<sup>1</sup> See *Memorandum Opinion & Order and Notice of Proposed Rulemaking* In the Matter of Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers (WT Docket No. 05-265) and Automatic and Manual Roaming Obligations Pertaining to Commercial Mobile Radio Services (WT Docket No. 00-193), Document FCC 05-160, August 31, 2005 at para. 44 *et seq.*

<sup>2</sup> *Id.* at para. 23.

application of manual roaming support requirements, prepaid zero-balance manual roaming service, and collect call manual roaming. Also relevant is the treatment of manual roaming requirements where access is provided via a WiFi or WiMax and calls completed through a PSTN gateway.

5. VeriSign's experience with its American Roaming Network also has made clear that whatever policy choices the Commission pursues in this matter, Federal preemption of all related State regulatory action should occur. Nearly half of all the States maintain diverse kinds of regulatory regimes that are applied to the providers of wireless roaming services – largely to obtain revenue based State Universal Service Fund contributions. State jurisdiction is tenuous at best, and the resulting State regulatory burdens are significant – ironically to obtain money for universal service from customers in need of wireless-based universal service. The inequity of this assessment for wireless manual roaming is also applicable at the national level in the context of USF reform.

## **Roaming Service Bureau Support Capabilities**

6. Both in the U.S. and abroad, VeriSign's service bureau support capabilities encompass almost every feature and need associated with meeting roaming requirements :

**VeriSign® Global Roaming Service** is an intelligent infrastructure services that provides carriers with immediate access to a large number of worldwide roaming agreements, without the financial or time constraints associated with most roaming-service implementations. The service is designed for wireless carriers whose infrastructure is based on Global Systems for Mobile Communications (GSM). Key components include signaling, dual international mobile subscriber identity (IMSI) security identity module (SIM), and data clearing and financial settlement.

**Americas International Roaming Services** provides carriers with seamless roaming throughout the Americas through an advanced network comprised of a group of transmitting, monitoring, and intelligence-gathering components. Services include international roaming, fraud protection, roamer validation, and call delivery services. These stable, cost-effective services are an economical way

to provide expanded roaming services throughout Latin America and the Caribbean.

**VeriSign Global Roaming Professional Services** provides carriers with: on-site subject-matter experts to carry out all the required functionality to deploy the most cost effective, timely, and profitable International Roaming Agreements (IRAs); subject-matter experts on premises to teach all the required functionality to deploy the most cost effective, timely, and profitable IRAs; on-site subject-matter experts for training on initiating, testing, and validating IRAs; and custom training, documentation, and ongoing support for roaming initiation and the maintenance of agreements.

**GPRS Roaming Exchange (GRX) service** provides carriers with a secure, scalable, connection between networks that helps to enable mobile data service roaming among GSM networks. Through a single connection to the VeriSign GRX, carriers are able to reach their GPRS roaming partners and provide expanded services for their subscribers.

**Wireless Data Roaming Service (WDRS)** provides carriers and ISPs with an outsource solution enabling them to offer wireless data roaming to their subscribers over Wi-Fi, CDMA2000 and GSM/GPRS networks. WDRS enables subscribers to enjoy the convenience and flexibility of hot spot roaming while traveling or just going to the local café.

**Prepaid Roaming (iRoam)** provides carriers with nationwide roaming for prepaid subscribers where wireless carriers can offer prepaid wireless subscribers roaming through seamless call origination and delivery in the ANSI-41 signaling environment based on third-generation technology.

**VeriSign Roamer View** (GSM and ANSI) provides carriers with visibility into roamer validation messages for voice and data, enabling service providers to monitor roamer activity in visited markets and roamers visiting their own markets with ease. Pre-call roaming information is processed in near real time, reformatted into readable text, and then presented to the service provider through a user-friendly interface to permit proactive management and support of roaming subscribers.

**Managed PKI Roaming** enables enterprises and consumers to securely download private data and digitally sign transactions, using digital certificates as credentials, from virtually any network device in the world.

7. In reaching any policy determinations concerning roaming, the Commission should consider the significant contribution that service bureaus offer in effecting neutral, cost-effective, and future proof mechanisms to support requirements in the U.S. and worldwide.